

Remarks

Claims 1, 2, 3, 5, 7 through 25, 27 and 29 through 61 remain pending in the application. Claims 1, 2, 3, 5, 7, 24, 25, 27, 57, 60 and 61 are amended and claims 4, 6, 26 and 28 are cancelled.

Claims 1 through 9, 12 and 13 stand rejected under 35 U.S.C. § 102(b) as anticipated by Burger, Biometric Authentication System, U.S. Patent 6,219,439 (Apr. 17, 2001). This rejection is respectfully traversed.

The method of Burger includes transmitting to a client terminal (i.e. reader 12) data derived from said user biometric parameter at the authentication device (Col. 6, ll. 42-44); transmitting from a user-presented device (i.e. smart card 14) to the client terminal said biometric identification template (Col. 6, ll. 44-47); and at the client terminal (i.e. reader 12) implementing a biometric identity authentication process between the data and the biometric identification template (Col. 6, ll. 44-56).

The method of Burger does not implement a first stage of a biometric identity authentication process at the client terminal and a second stage implemented at the user-presented device. Rather, the entire biometric identity authentication process is implemented at the client terminal. Although Burger teaches a second comparison/authentication of user information between the non-biometric identifier of the smart card and other user data stored remote from the smart card (claim 1, Col. 6, ll. 48-51 and Col. 7, ll. 1-44), such a second authentication of non-biometric information is not part of the biometric identity

authentication process and is implemented at the client terminal instead of the user-presented device. Thus, the user-presented device (i.e. the smart card) in Burger is only used for storing. Neither the biometric identity authentication process nor the authentication of non-biometric information is implemented at the user-presented device in Burger.

Burger also does not teach or suggest that the biometric identification template is divided into a secure portion and an open portion, and that only the open portion of the biometric identification template is transmitted from the user-presented device to the client terminal. Rather, the entire biometric identification template of Burger is transmitted out of the user-presented device (Col. 6, ll. 39-42). The user identification data (Col. 7, ll. 1-5) of Burger which is transmitted out of the secure user-presented device is not biometric data and does not belong to the biometric identification template, and therefore cannot be considered as the open portion of the biometric identification template.

Therefore, all the limitations of amended claim 1 are not disclosed in Burger and thus are not anticipated by Burger. This rejection should be withdrawn. Dependent claims 3, 5, 7-9, 12 and 13 depend from amended claim 1 and thus the rejection with respect to the dependent claims should also be withdrawn.

Claim 2 as amended, defines a method of registration of a user according to a biometric parameter of the user. A computed biometric identification template is divided into secure portion and open portion at the authorized client terminal. The open portion contains data unauthorized modification of which may not cause an imposter to be incorrectly authenticated as a genuine

user, and comprises parameters of a predetermined number of unique features of the template. Both secure portion and open portion are transmitted to and stored on a user-presented device, wherein the secure portion is only accessible within the user-presented device and not externally.

As discussed above, Burger does not disclose the dividing of the biometric identification template into secure portion and open portion at the authorized client terminal, and transmitting and storing both secure portion and open portion of the template on the user-presented device. Therefore, all the limitations of amended claim 2 are not disclosed in Burger and thus are not anticipated by Burger. This rejection should be withdrawn.

Claims 38 through 43 and 45 through 61 stand rejected under 35 U.S.C. § 102(e) as anticipated by Studd, Method and System for Executing Applications on a Mobile Device, U.S. Patent Application Publication 2004/0122774 (Jun. 24, 2004). This rejection is respectfully traversed.

Studd discloses a method of executing an operation using first and second processors. The method includes storing in the first processor (e.g. application framework 304 of computing device 302 in Fig. 3) a plurality of process names with associated process identifiers (e.g. one or more internal framework applications, paragraph [0038]); storing in the second processor (e.g. mobile device 336 in Fig. 3) a plurality of process names and process identifiers (e.g. one or more mobile device applications in paragraph [0041]); identifying at the second processor a process to be executed and issuing a request to the first process to execute an associated process (e.g. a list of available mobile device applications provided by the

mobile device 336, paragraph [0051]); locating the associated process and executing said associated process at the first processor (e.g. a framework application associated with the selected mobile device application is configured and activated; paragraphs [0053]-[0054] and [0058]-[0059]).

Studd teaches that the mobile device applications are associated with the framework applications, and the framework application associated with the selected mobile device application can be identified (paragraphs [0053]-[0054]). However, Studd does not disclose that the process names and process identifiers in the second task table are those process names and process identifiers in the first task table, and does not disclose that a process locator is used to locate the selected process in the first processor as required by claim 38. Studd does not disclose returning the result in the first processor to the second processor, but discloses receiving data from the second processor (paragraph [0063]). Thus this rejection should be withdrawn. Dependent claims 39-43, 45-48 depend from independent claim 38 and thus the rejection with respect to the dependent claims should also be withdrawn.

As discussed above, the apparatus of independent claim 49 which corresponds to the method of claim 38 is not anticipated by Studd and thus the rejection should be withdrawn. Dependent claims 50-61 depend from claim 49 and the rejection of the dependent claims should also be withdrawn.

Claims 14 through 17 and 23 stand rejected under 35 U.S.C. §103(a) as unpatentable over Burger, in view of Studd. As discussed above, Burger does not teach or suggest dividing the biometric identity authentication process into 2 stages, and

does not teach or suggest implementing the 2 stages at a client terminal and a user-presented device, respectively. In addition, Burger does not teach or suggest that the biometric identification template is divided into a secure portion and an open portion, and further that only the open portion of the biometric identification template is transmitted from the user-presented device to the client terminal. Therefore, amended claim 1 is not obvious in light of Burger. Studd does not teach or suggest the missing limitations and thus the Examiner's proposed combination does not render claim 1 obvious. Claims 14 through 17 and 23 depend from claim 1 and thus the rejection with respect to the dependent claims should be withdrawn.

Claims 18 through 20 stand rejected under 35 U.S.C. §103(a) as unpatentable over Burger, in view of Scheidt, Access System Utilizing Multiple factor Identification and Authentication, U.S. Patent Application Publication 2005/0235148 (Oct. 20, 2005). As discussed above, amended claim 1 is not obvious in light of Burger. Scheidt does not teach or suggest the missing limitations and thus the Examiner's proposed combination does not render claim 1 obvious. Claims 18 through 20 depend from claim 1 and thus the rejection with respect to the dependent claims should be withdrawn.

Claims 10, 11, 24 through 29 and 30 through 32 stand rejected under 35 U.S.C. §103(a) as unpatentable over Burger, in view of Hamid, Method and Apparatus for Hashing Data, U.S. Patent 7,274,804 (Sep. 25, 2007).

Hamid discloses a method of generating public data that can be used for fingerprint matching. The public data is hashed data in the form of offset locations or alignment locations (Col. 6,

11. 35-38 and Col. 7, 11. 41-43), and is transmitted from a user-presented device (e.g. smartcard) to a client terminal (e.g. host processor) for alignment of a captured fingerprint image. However, the public data in Hamid is hashed offset locations or alignment locations, and is not a portion of the biometric identification template. Therefore, Hamid does not disclose or suggest dividing the biometric identification template into secure portion and open portion, wherein the open portion contains data unauthorized modification of which may not cause an imposter to be incorrectly authenticated as a genuine user and comprises parameters of a predetermined number of unique features of the template. Thus Hamid does not provide the missing limitations to render amended claim 1 obvious in light of Burger as discussed above. Thus the rejection of dependent claims 10 and 11 should be withdrawn.

Independent claim 24 is an amended apparatus claim corresponding to amended method claim 1. As discussed above with respect to amended claim 1, the Examiner's proposed combination of Burger and Hamid do not teach, suggest or render obvious all the limitations of claim 24 and thus the rejection should be withdrawn. Dependent claims 25 through 29 and 30 depend from amended claim 24 and thus the rejection with respect to the dependent claims should also be withdrawn.

The Examiner has not provided any motivation to make the proposed combination of Burger and Hamid. As Hamid specifically disclaims the transmission of any biometric data (Background of the Invention) the Examiner's proposed combination of Burger with Hamid must find an explicit motivation to combine the references sufficient to overcome the teaching of Hamid against the transmission of biometric data. No such motivation is

provided and thus the rejections based on this proposed combination should be withdrawn.

Claims 21 and 22 stand rejected under 35 U.S.C §103(a) as unpatentable over Burger, in view of Studd and Hamid. As discussed above, the proposed combination does not teach, suggest or render obvious the limitations of independent claim 1. Claims 21 and 22 depend from claim 1 and thus the rejection with respect to these claims should be withdrawn. The Examiner has not provided any motivation to combine Hamid with Burger and Studd.

As discussed, the explicit disclaimer of Hamid to the transmission of biometric data renders the Examiner's proposed combination impossible absent explicit motivation to combine. This rejection should be withdrawn.

Claims 33 through 37 stand rejected under 35 U.S.C §103(a) as unpatentable over Burger, in view of Hamid and Studd. As discussed above, the proposed combination does not teach, suggest or render obvious the limitations of amended independent claim 24. Claims 33 through 37 depend from amended claim 24 and thus the rejection with respect to these claims should be withdrawn.

The Examiner has not provided any motivation to combine Hamid with Burger and Studd. As discussed, the explicit disclaimer of Hamid to the transmission of biometric data renders the Examiner's proposed combination impossible absent explicit motivation to combine. This rejection should be withdrawn.

Claim 44 stands rejected under 35 U.S.C §103(a) as unpatentable over Studd in view of Hamid. As explained above, Studd does not teach, suggest or render obvious storing a second task table containing the process names and process identifiers which are those process names and process identifiers in the first task table, and does not teach, suggest or render obvious that a process locator is used to locate the selected process in the first processor as defined in claim 38.

By storing the same process names and process identifiers in the first processor and the second processor and storing the process locator to locate the selected process in the first processor, the second processor of claim 38 simply issues a request to the first processor such that the first processor locates the selected process using the process locator and executes the selected process.

Hamid does not teach, suggest or render obvious the method of executing an operation using first and second processors as claimed in claim 38. In particular, Hamid does not disclose the first task table and the second task table, and does not disclose or suggest locating a selected process using a process locator.

In view of the above, Studd and Hamid, either alone or in combination, do not teach, suggest or render obvious the limitations of claim 38. Therefore, the rejections of claim 38 and of its dependent claims 39-48 should be withdrawn.

Conclusion

This response has addressed all of the Examiner's grounds for rejection. The rejections based on prior art have been traversed. Reconsideration of the rejections and allowance of the claims is requested.

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